

**EXHIBIT N**  
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**From:** Rivera, Sylvia <SRivera@mofo.com>  
**Sent:** Wednesday, December 20, 2017 12:04 PM  
**To:** James Baker; QE-Waymo  
**Cc:** UberWaymoMoFoAttorneys; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com) (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com); Uber-sg@LISTS.SUSMANGODFREY.COM; John Cooper (JCooper@fbm.com); Matthew Cate (MCate@fbm.com)  
**Subject:** RE: Waymo v. Uber; chat application retention settings CONFIDENTIAL

Jim,

For HipChat, the reference to November 29, 2017 in the second sentence should state November 29, 2016. Thus:

HipChat. Until November 29, 2016, Uber retained HipChat direct and group messages for 75 messages and some rooms for seven days. After November 29, 2016, the retention setting was set to indefinite. Uber decommissioned HipChat in April 2017 and is preserving all HipChat messages then in existence.

Thanks for seeking clarification.

Sylvia

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**From:** James Baker [mailto:jamesbaker@quinnemanuel.com]  
**Sent:** Wednesday, December 20, 2017 11:19 AM  
**To:** Rivera, Sylvia; QE-Waymo  
**Cc:** UberWaymoMoFoAttorneys; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com) (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com); Uber-sg@LISTS.SUSMANGODFREY.COM; John Cooper (JCooper@fbm.com); Matthew Cate (MCate@fbm.com)  
**Subject:** RE: Waymo v. Uber; chat application retention settings CONFIDENTIAL

- External Email -

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Thanks Sylvia. Are the highlights below typos?

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**From:** Rivera, Sylvia [mailto:SRivera@mofo.com]  
**Sent:** Wednesday, December 20, 2017 11:04 AM  
**To:** QE-Waymo <gewaymo@quinnemanuel.com>  
**Cc:** UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com) (BSF\_EXTERNAL\_UberWaymoLit@bsflp.com) <BSF\_EXTERNAL\_UberWaymoLit@bsflp.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; John Cooper (JCooper@fbm.com) <JCooper@fbm.com>; Matthew Cate (MCate@fbm.com) <MCate@fbm.com>  
**Subject:** Waymo v. Uber; chat application retention settings CONFIDENTIAL

Counsel,

As discussed, here is information about the default retention settings for chat applications that generally were approved for use at Uber.

1. HipChat. Until November 29, 2016, Uber retained HipChat direct and group messages for 75 messages and some rooms for seven days. After November 29, 2017, the retention setting was set to indefinite. Uber decommissioned HipChat in April 2017 and is preserving all HipChat messages then in existence.

2. uChat. On April 24, 2017, Uber rolled out uChat, a proprietary chat messaging application designed by Uber, to replace HipChat. When uChat was launched, Uber retained uChat messages for personnel on legal hold during the duration of the hold, and otherwise retained messages for seven days. uChat retention is now 60 days for personnel not on legal hold.
3. Google Hangouts. Before Uber initiated its recent chat policy in September 2017, Google Hangouts was defaulted to “off the record.” Currently, it is set to “on the record” with a 60-day retention period for personnel not on legal hold. Messages for personnel on legal hold are retained during the duration of the hold.
4. Slack. Per Slack’s terms of service, the default Slack message retention setting is to retain all messages unless a user edits or deletes their messages.
5. Wickr SCIF/PRO. Before Uber initiated its recent chat policy in September 2017, the default retention for Wickr messages was six days unless a user deleted their messages earlier than that or set a different expiration time.

Regards,  
Sylvia

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